

1434 Westmoreland Ave.
Syracuse, NY 13210-3439
July 8, 1999

9445 '99 JUL 13 P2:18

William Hubbard
Dockets Management Branch (HFA305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket No. 98N - 1038, "Irradiation in the Production, Processing, and Handling of Food."

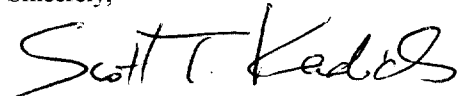
Dear Mr. Hubbard:

I am extremely concerned about the prospect of weakening or eliminating the labeling requirements for irradiated food. Any foods, or any foods containing ingredients that have been treated by irradiation, should be clearly labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the radura, the international symbol of irradiated food. If the food is not packaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale.

Like other labels required by federal law, irradiation labels must be truthful and not misleading. Proposals to use euphemistic phrases like "cold pasteurization" are inappropriate because pasteurization is an entirely different process involving rapid heating and cooling. The terms "treated with radiation" or "treated by irradiation" should be retained because they accurately portray the irradiation process. The radura symbol, without written disclosure is not adequate.

Consumers have a right-to-know how their food has been processed. Please ensure that labeling requirements are strengthened, not weakened.

Sincerely,



Scott T. Kadick

98N 1038

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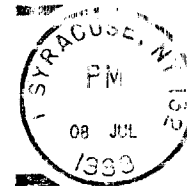
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Heidi V. Kadick

KADICK
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